

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

SHELDON LOCKETT; MICHELLE ) Case No.  
DAVIS; and CLYDE DAVIS, ) 18-CV-5838-PJW

Plaintiffs, )

11 OF LOS ANGELES, a public )

COUNTY OF LOS ANGELES, a public entity; LOS ANGELES COUNTY SHERIFF'S DEPARTMENT, a law enforcement agency; SHERIFF JIM McDONNELL; MIZRAIN ORREGO, a Deputy Los Angeles County Sheriff; SAMUEL ALDAMA, a Deputy Los Angeles County Sheriff; and DOES 1 through 100, inclusive,

Defendants. )

VIDEOTAPED DEPOSITION OF DEPUTY AUSTREBERTO GONZALEZ

## Volume I

Via Videoconference

Tuesday, August 11, 2020

Reported by:  
Gideon Choi  
CSR No. 13258

**Exhibit 27 -- redacted**  
**Because of size limitations,**  
**submitted in two parts. This**  
**is part 2 of 2**

1 A Yes. 12:28:38	1 THE COURT REPORTER: The answer was yes. 12:30:25
2 MR. IVIE: Objection; leading. 12:28:39	2 MR. SWEENEY: Thank you. 12:30:28
3 Excuse me, Mr. [REDACTED]. I'm making an 12:28:40	3 BY MR. SWEENEY: 12:30:29
4 objection. Can you wait until I'm finished? 12:28:43	4 Q The last sentence in that paragraph on Page 1 of 12:30:36
5 THE WITNESS: Yes, sir. 12:28:45	5 10: "The gang members communicate exclusively through 12:30:42
6 MR. IVIE: Objection; it's leading; suggestive; and 12:28:46	6 WhatsApp, an encrypted messaging app on their phones." 12:30:48
7 no foundation for the witness's testimony; calls for a 12:28:49	7 Is that true? 12:30:50
8 conclusion. 12:28:51	8 MR. IVIE: Again, objection; leading; suggestive; no 12:30:51
9 MR. ROMERO: This is counsel for the deponent. I'm 12:28:52	9 foundation; calls for a conclusion on the part of this 12:30:54
10 going to interpose my own objection. We seem to be 12:28:56	10 witness. 12:30:57
11 getting from Mr. Ivie the same objection for every 12:28:58	11 BY MR. SWEENEY: 12:30:58
12 single question. It's resulting in a disruption to the 12:28:59	12 Q Is that true, sir? 12:30:59
13 testimony, I believe. 12:29:02	13 A Yes. 12:30:59
14 I'm going to ask the deponent, are these 12:29:04	14 Q All right. And how do you know that? 12:31:00
15 objections disrupting your testimony, sir? 12:29:07	15 A There was an incident where a phone was left 12:31:03
16 THE WITNESS: They are. 12:29:10	16 behind in dispatch to be charged, to charge the phone, 12:31:09
17 MR. ALTURA: So I'd ask that we get a standing 12:29:11	17 and the watch deputy came and told a few of us that 12:31:14
18 objection since 99 percent of the objections have been 12:29:13	18 that's how the inked communicated. Because they left 12:31:23
19 the same. I don't mean to be disrespectful. Perhaps 12:29:16	19 the WhatsApp app open or the phone unlocked and then 12:31:27
20 after lunch, we can reconvene with the standing 12:29:19	20 messages started popping up regarding -- well, 12:31:31
21 objection because it's very hard even for me to follow. 12:29:21	21 communication with other inked members of this group 12:31:35
22 Thank you. 12:29:24	22 through WhatsApp. 12:31:40
23 MR. IVIE: Okay. So I'm not going to agree to that, 12:29:24	23 Q Okay. Does that indicate to you that it's a 12:31:43
24 but you've made your record. 12:29:26	24 secretive society? 12:31:48
25 /// 12:29:26	25 MR. IVIE: Objection; leading; suggestive; no 12:31:50
	Page 80
1 BY MR. SWEENEY: 12:29:26	1 foundation; calls for speculation on the part of this 12:31:52
2 Q Okay. So is that true, Deputy, what I just 12:29:29	2 witness. 12:31:55
3 read? 12:29:34	3 THE WITNESS: Yes. 12:31:57
4 MR. IVIE: Again, it calls for a conclusion. 12:29:34	4 MR. SWEENEY: Okay. Let's take our break. It's 12:31:57
5 MR. SWEENEY: You got your objection in. 12:29:37	5 12:30, and we'll be back at what? Mr. Ivie said 1:15? 12:32:02
6 MR. IVIE: Well, then why are you repeating the 12:29:39	6 MR. IVIE: Yes. 12:32:08
7 question? 12:29:43	7 MR. ROMERO: Before we go off the record, I'd just 12:32:09
8 MR. SWEENEY: Because he doesn't recall it. 12:29:44	8 like to state that these continued objections by 12:32:11
9 MR. IVIE: Okay. If you're going to repeat the 12:29:45	9 Mr. Ivie are making this deposition completely 12:32:13
10 question, I'm going to restate my objection. 12:29:47	10 impossible by the deponent, and they're disruptive, they 12:32:16
11 MR. SWEENEY: But, Mr. Ivie -- 12:29:49	11 are disorienting, and I have a headache just trying to 12:32:20
12 MR. IVIE: The process is you ask the question, I 12:29:51	12 get through them. I'm not trying to be disruptive. I 12:32:24
13 object. 12:29:56	13 want to make sure the deponent gets the best testimony 12:32:26
14 BY MR. SWEENEY: 12:29:56	14 on the record for all sides. 12:32:29
15 Q Do you recall the question? 12:29:59	15 MR. SWEENEY: I concur. And welcome to the world of 12:32:30
16 A Yes, I do. 12:30:01	16 Mr. Rickey Ivie. That's been his style. 12:32:33
17 Q Okay. Is that true? 12:30:01	17 MR. IVIE: Welcome to the world of making appropriate 12:32:36
18 A Yes. 12:30:03	18 objections at a deposition. 12:32:39
19 MR. IVIE: Again, objection; it calls for a 12:30:04	19 MR. SWEENEY: Thank you, Mr. Ivie. 12:32:40
20 conclusion on the part of this witness; and there's no 12:30:07	20 MR. IVIE: It's leading; suggestive; and lacks 12:32:42
21 foundation. 12:30:09	21 foundation. 12:32:44
22 MR. SWEENEY: You've objected, Mr. Ivie. Thank 12:30:10	22 MR. SWEENEY: Thank you, Mr. Ivie. 12:32:44
23 you. 12:30:13	23 MR. IVIE: You're welcome. 12:32:46
24 Did you get the answer Madame Court Reporter -- I'm 12:30:15	24 MR. SWEENEY: Have a good lunch. 12:32:47
25 sorry -- Mr. Court Reporter? I'm sorry. 12:30:22	25 MR. IVIE: All right. You too. 12:32:49
	Page 81

<p>1 THE VIDEOGRAPHER: This marks the end of 12:32:50      2 Media Unit No. 4. The time is 12:32, and we are off the 12:32:53      3 record. 12:32:55      4 (Recess taken from 12:32 p.m. to 1:32 p.m.) 13:32:50      5 THE VIDEOGRAPHER: This marks the beginning of 13:32:50      6 Media No. 5. The time is 1:32 p.m., and we are on the 13:32:54      7 record. 13:32:56      8 BY MR. SWEENEY: 13:32:57      9 Q Good afternoon, Deputy. 13:32:59      10 A Good afternoon, sir. 13:33:01      11 Q What I'm going to do now is, to make this go 13:33:02      12 quicker, we're going to put up the Exhibit 105 and we're 13:33:07      13 just going to go line by line, and I'm going to ask you 13:33:12      14 questions about it. 13:33:20      15 All right. At the top, can you see it, Deputy? 13:33:21      16 A Yes. 13:33:23      17 Q Okay. At the top, it says: "The Executioners, 13:33:24      18 led by inked shot caller Deputy J█████████, have 13:33:29      19 paralyzed Compton through their use of violence against 13:33:35      20 deputies and threats of illegal work slowdowns, by which 13:33:39      21 Executioners members and associates at Compton will 13:33:45      22 purposefully cease some or all of their law enforcement 13:33:49      23 duties while continuing to be paid in order to impose 13:33:54      24 their will upon Compton by force." 13:33:59      25 Let me ask you a question about this. You 13:34:04</p>	<p>1 Q It goes on to say: "Deputy A█████████" -- 13:35:50      2 I'm sorry -- "an inked member of the Executioners, 13:36:01      3 Deputy ██████████." Is that true? 13:36:07      4 A Yes. 13:36:10      5 Q Okay. Sorry about that. 13:36:11      6 What effect did that have on the policy and 13:36:19      7 runnings of the -- strike that -- on the inner workings 13:36:26      8 of the Compton station? 13:36:30      9 A Well, I mean, the Scheduling and Training Deputy 13:36:32      10 position is huge. ██████████ had this position for a 13:36:36      11 number of years where it allowed him to -- where it 13:36:43      12 allowed him to give overtime spots, variances of, you 13:36:52      13 know, days off and move around deputies as he pleased 13:36:57      14 because, you know, he was the Scheduling Deputy. I 13:37:04      15 mean, he made the schedules. He controlled the 13:37:09      16 schedules. And, you know, the sergeant who was in 13:37:13      17 charge of him gave him free will, you know. So, you 13:37:17      18 know, he had the experience. He knew what that position 13:37:23      19 was all about and, you know, it's a position of control 13:37:25      20 at the station. 13:37:30      21 Q Let me ask you this. Is it common knowledge at 13:37:31      22 the station that the sergeants are frightened of 13:37:33      23 The Executioners? 13:37:41      24 A The sergeants allow it. It's common knowledge 13:37:42      25 that sergeants allow, you know, this group to basically 13:37:46</p>
<p>Page 82</p> <p>1 already said or you already made a comment about this. 13:34:08      2 You already said that Deputy ██████████ is the shot 13:34:11      3 caller of the gang; correct? 13:34:15      4 A Yes. 13:34:17      5 Q Okay. Is it true, after that, you see 13:34:17      6 Deputy ██████████, his name and there's a comment. Is that 13:34:22      7 true, all that I read to the end of that sentence? 13:34:27      8 A Yes. 13:34:30      9 MR. SWEENEY: Okay. What happened? Oh, okay. All 13:34:31      10 right. Thank you. 13:34:35      11 BY MR. SWEENEY: 13:34:57      12 Q Okay. Next sentence: "One such work slowdown 13:34:57      13 occurred in 2019, when shot caller ██████████ a Deputy, 13:35:01      14 confronted Acting Captain ██████████." 13:35:06      15 Was there a confrontation between the two? 13:35:11      16 A Yes. Yes, there was. 13:35:18      17 Q A verbal confrontation; is that correct? 13:35:20      18 A Just an altercation, verbal. 13:35:24      19 Q Okay. And did the following happen: ██████████ 13:35:26      20 informed Waldie that he, and by extension 13:35:30      21 The Executioners gang that he presided over, was 13:35:33      22 demanding that the Training and Scheduling Deputy, 13:35:38      23 ██████████, be replaced with an inked member of 13:35:44      24 The Executioners." Is that true? 13:35:47      25 A Yes. 13:35:50</p>	<p>1 do whatever they want. 13:37:49      2 Q Would you say that this group is -- do you know 13:37:52      3 the term "de facto" -- in reality, in control of the 13:38:00      4 station, this group? 13:38:04      5 A Yes. Yes, absolutely. 13:38:06      6 Q Okay. It goes on to say: "The Training and 13:38:08      7 Scheduling Deputy position was enormously desirable to 13:38:17      8 the gang as that position would be able to dole out 13:38:20      9 preferred shifts and inked" -- I'm sorry -- "to inked 13:38:24      10 gang members, as well as provide them with any days off 13:38:30      11 that they would desire." Is that true? 13:38:34      12 A Yes. 13:38:36      13 Q And it goes on to say: "All to the extreme 13:38:37      14 prejudice of non-gang members, who would be disproportionately 13:38:48      15 and negatively impacted by the most desirable scheduling 13:38:54      16 being funneled exclusively to the gang." Is that true? 13:38:58      17 A Yes. 13:39:02      18 Q It goes on to say: "Lieutenant ██████████ 13:39:03      19 immediately put his foot down and advised ██████████ that he 13:39:08      20 would not be intimidated into carrying out his duties 13:39:13      21 based upon the desires of The Executioners." Is that 13:39:17      22 true? 13:39:21      23 A Yes. 13:39:21      24 Q How did you find that out? 13:39:21      25 A Every -- the whole station knew about it. 13:39:23</p>

Page 83

Page 85

22 (Pages 82 - 85)

1 Everybody knew about it. In fact, I, you know, had a 13:39:26  
 2 little -- I ran into Acting Captain, Lieutenant [REDACTED] 13:39:30  
 3 and, you know, I asked him, "Is this true? The line is 13:39:35  
 4 talking about this. Is this true?" And he confirmed 13:39:40  
 5 it. 13:39:43  
 6 Q Okay. "In retaliation, [REDACTED] 13:39:45  
 7 The Executioners, and their associates at Compton 13:39:55  
 8 implemented the threatened work slowdown wreaking havoc 13:39:59  
 9 in Compton and resulting in enormous losses to County 13:40:06  
 10 taxpayers, and these individuals who participated in the 13:40:09  
 11 slowdown received their full public salaries for doing 13:40:13  
 12 little or no work." Is that true? 13:40:17  
 13 A Yes. 13:40:19  
 14 Q You know that because -- 13:40:20  
 15 A There was nobody being arrested. Very minimal 13:40:25  
 16 arrests were being done at that time. We have a booking 13:40:29  
 17 line. We would hardly ever see a unit in the booking 13:40:32  
 18 line with, you know -- you know, with suspects in their 13:40:37  
 19 back seats. It was so obvious that, you know, we all 13:40:41  
 20 noticed that. 13:40:45  
 21 Q Would you say that the public was in danger 13:40:46  
 22 because of the actions of these Executioners with the 13:40:51  
 23 work slowdowns? 13:40:55  
 24 A Well, there's no -- you know, if there's no 13:40:57  
 25 police presence out in the street and they're parked 13:41:01

Page 86

1 Q He did know? 13:42:52  
 2 A Oh, yes, he was aware of them. He knew about 13:42:54  
 3 them. 13:42:56  
 4 Q How do you know that? 13:42:56  
 5 A Shortly after Aldama's deposition regarding the 13:42:57  
 6 -- I believe it was the [REDACTED] case, Commander -- well, 13:43:02  
 7 Captain Thatcher then sent out an e-mail basically 13:43:09  
 8 saying that if you could not explain your way out of a 13:43:12  
 9 tattoo -- or maybe you should learn how to articulate 13:43:15  
 10 why you got a tattoo. 13:43:20  
 11 Q How did you take that when you received that 13:43:24  
 12 e-mail? When I say "take that", what was going through 13:43:28  
 13 your mind? 13:43:31  
 14 MR. IVIE: Counsel, the witness didn't finish his 13:43:32  
 15 answer to your question. 13:43:35  
 16 MR. SWEENEY: I'm sorry. 13:43:36  
 17 MR. IVIE: Can you let the witness finish the answer? 13:43:37  
 18 MR. SWEENEY: I'm sorry, Mr. Ivie. 13:43:39  
 19 BY MR. SWEENEY: 13:43:41  
 20 Q Were you finished? 13:43:41  
 21 A Yes. It was, you know, that there was an e-mail 13:43:42  
 22 that Captain Thatcher at the time sent out to the 13:43:46  
 23 station. 13:43:51  
 24 Q Did Captain Thatcher work -- prior to the e-mail 13:43:51  
 25 coming out, did Captain Thatcher work closely with those 13:44:02  
 Page 88

1 somewhere, then I would say yes. 13:41:07  
 2 Q You go on to say or it goes on to say in your 13:41:10  
 3 claim here, Exhibit 105: "Lieutenant [REDACTED] after 13:41:17  
 4 notifying his superior, Captain Michael Thatcher, 13:41:23  
 5 instigated a punitive transfer of gang leader [REDACTED] to 13:41:27  
 6 Industry station, but Lieutenant [REDACTED] was later 13:41:34  
 7 overruled and Juarez was allowed to return to his gang 13:41:38  
 8 home base in Compton." Is that true? 13:41:42  
 9 A Yes. 13:41:45  
 10 Q So do you know who allowed -- strike that. 13:41:45  
 11 Do you know who approved the transfer back of 13:41:56  
 12 [REDACTED] to the Compton station? 13:41:59  
 13 A Well, sir, I know it wasn't the 13:42:02  
 14 Acting Captain, Lieutenant [REDACTED]. The person above him 13:42:05  
 15 is -- was Commander Thatcher, and then Michael Thatcher 13:42:11  
 16 -- and then above him, the division chief, who was 13:42:18  
 17 [REDACTED]. So, you know, I'm not there, I'm not up 13:42:23  
 18 there, but there's a chain of command in our department, 13:42:25  
 19 so -- I know our acting captain didn't want [REDACTED] back 13:42:27  
 20 and nobody at the station wanted [REDACTED] back. It was -- 13:42:35  
 21 you know, we felt relieved when he wasn't at the 13:42:39  
 22 station. 13:42:42  
 23 Q By the way, do you know if Captain Thatcher knew 13:42:42  
 24 of the existence of The Executioners? 13:42:47  
 25 A Yes. 13:42:52

Page 87

1 who were in charge of The Executioners, like the shot 13:44:06  
 2 callers and the higher-ups? 13:44:10  
 3 A Well, he was our Captain, and 13:44:12  
 4 Deputy [REDACTED] was our Scheduling Deputy so, you 13:44:19  
 5 know, there is somewhat of a close supervisory, you 13:44:21  
 6 know, relationship. 13:44:28  
 7 Q Okay. In your mind, is there any way in your 13:44:33  
 8 mind -- you know the inner workings of the Compton 13:44:41  
 9 station -- that Captain Thatcher could not have been 13:44:44  
 10 knowledgeable about this gang before 2018 when it was 13:44:46  
 11 revealed, this tattoo? 13:44:49  
 12 A Let me see if I understand your question 13:44:53  
 13 correctly. So you're saying -- basically, you're asking 13:44:56  
 14 if Captain Thatcher had any knowledge of this group of 13:44:58  
 15 deputies prior to Aldama's deposition? 13:45:03  
 16 Q In your mind because you know the inner workings 13:45:07  
 17 and what was going on with the work slowdowns, what's 13:45:12  
 18 your answer to that? 13:45:15  
 19 A Yes, he had knowledge. 13:45:15  
 20 Q Okay. I noticed that -- strike that. 13:45:18  
 21 Did you ever you take any pictures of any of the 13:45:31  
 22 tattoos depictions? 13:45:34  
 23 A Yes. 13:45:38  
 24 Q And what was that? 13:45:38  
 25 A It was a picture of, you know, the tattoo, but 13:45:41  
 Page 89

1 it was on a mouse pad and, like, a pencil holder, along. 13:45:45  
 2 I think, with a mouse, you know, with the tattoo's 13:45:52  
 3 logo. 13:45:57  
 4 MR. SWEENEY: Okay. We're going to up pull up 13:45:58  
 5 another exhibit. I think we're up to 108; is that 13:46:00  
 6 correct? 13:46:04  
 7 MR. GLICKMAN: This would be 109. 13:46:04  
 8 MR. SWEENEY: I'm sorry. 109. Can you see -- 13:46:06  
 9 Mr. Glickman, can you blow it up a little bit? 13:46:10  
 10 MR. GLICKMAN: Just give me one second. It should be 13:46:13  
 11 on the screen now. 13:46:36  
 12 BY MR. SWEENEY: 13:46:37  
 13 Q Okay. Is that a picture you took, sir? 13:46:38  
 14 A Yes, sir. 13:46:41  
 15 Q And whose desk is that; do you know? 13:46:42  
 16 A That was Deputy [REDACTED] 13:46:47  
 17 Q And how long, if you know -- strike that. 13:46:51  
 18 Approximately what date did you first see that 13:46:57  
 19 mouse pad and pencil holder? 13:47:01  
 20 A I saw it after -- I want to say it was around 13:47:04  
 21 the month of May of the present year. 13:47:09  
 22 Q Okay. Do you know where he got it made? 13:47:12  
 23 A Where he got it made? No, I don't know. One 13:47:17  
 24 day, I just came to pick up files, and I noticed -- you 13:47:20  
 25 know, I noticed the mouse pad and the mouse, and then 13:47:24

Page 90

1 of pressure to do so? 13:49:08  
 2 A Yes. Where it was, it was a division meeting 13:49:09  
 3 where captains from each station attend, and the word 13:49:14  
 4 was, because this was said in briefing by one of the 13:49:21  
 5 sergeants, that our captain, Captain Thatcher, had been 13:49:24  
 6 chewed out because Compton station's stats were very 13:49:29  
 7 low. 13:49:33  
 8 Q And so you said he was chewed out. That's what 13:49:39  
 9 you heard? 13:49:42  
 10 A Yeah. And I can't remember the sergeant, but in 13:49:42  
 11 a briefing, they said that the captain had his ass 13:49:45  
 12 chewed out. That's what they said. 13:49:48  
 13 Q And now that we're on that -- let's go ahead and 13:49:50  
 14 (inaudible) but now that we're on that, what was done as 13:49:57  
 15 a result of him being chewed out, if you know? 13:50:00  
 16 A Well, captain came back to the station and, you 13:50:04  
 17 know, lieutenants and the scheduling sergeant, they 13:50:11  
 18 started asking for stats, asking to arrest people. If 13:50:21  
 19 you're not arresting people, you know, you're going to 13:50:26  
 20 be put in traffic cars and front counter positions, you 13:50:29  
 21 know, less desirable positions. 13:50:35  
 22 Q Okay. Let's skip to Page 3, the fourth 13:50:37  
 23 paragraph down, because that's where you talk about 13:50:45  
 24 that. Let me ask you if this is true. 13:50:48  
 25 "In August or September of 2017, there was a 13:50:52  
 Page 92

1 like a week later, I noticed it in two other deputies' 13:47:32  
 2 desk. 13:47:36  
 3 Q Okay. And who were the two other deputies? 13:47:37  
 4 A Deputy [REDACTED] and Deputy [REDACTED]. 13:47:40  
 5 Q Okay. Do you know if now Commander Thatcher is 13:47:45  
 6 a member of one of these clique gangs in the 13:47:57  
 7 Sheriff's Department? 13:48:03  
 8 A No. 13:48:03  
 9 Q You do not know? 13:48:04  
 10 A I don't know. 13:48:05  
 11 Q Had you heard -- strike that. 13:48:07  
 12 Have you heard of The Regulators? 13:48:12  
 13 A I've heard of them, yes. 13:48:14  
 14 Q Have you heard of The Vikings? 13:48:16  
 15 A Yes, sir. 13:48:19  
 16 Q Did you ever ask Captain Thatcher why he was 13:48:20  
 17 sympathetic to The Executioners? 13:48:33  
 18 A No, sir. 13:48:37  
 19 Q Did you ever wonder? 13:48:37  
 20 A At first I did, but then after certain events 13:48:39  
 21 happened, I understood why there was -- he was 13:48:48  
 22 sympathetic to the group. 13:48:51  
 23 Q And why was that? 13:48:53  
 24 A Because they boosted his stats at the station. 13:48:55  
 25 Q Okay. And at some point was he under any kind 13:48:59

Page 91

1 meeting with various captains at the division level, and 13:50:54  
 2 Thatcher was reprimanded for the arrest statistics being 13:50:59  
 3 low at Compton." You just testified to that; correct? 13:51:04  
 4 A Yes, sir. 13:51:07  
 5 Q Okay. How many stations are in a division? 13:51:07  
 6 A I believe five. 13:51:13  
 7 Q And they are? 13:51:14  
 8 A Compton Station, Century Station, 13:51:16  
 9 Marina Del Rey, Eastlake Station, and I believe 13:51:22  
 10 South Lake Station. 13:51:27  
 11 Q Okay. You go on to say or the claim goes on to 13:51:27  
 12 say: "Thatcher reacted by implementing an illegal 13:51:33  
 13 arrest quota framework at Compton, in violation of 13:51:38  
 14 California law, Vehicle Code Section 41602." 13:51:40  
 15 Now, at some point did you find out prior to you 13:51:47  
 16 submitting this claim that it was, in fact, illegal to 13:51:54  
 17 set arrest quotas? 13:51:58  
 18 A Yes. 13:52:00  
 19 Q And it goes on to say: "Thatcher sought the 13:52:00  
 20 assistance of [REDACTED] and the gang resulting in Compton 13:52:12  
 21 arrest statistics increasing by an approximate 13:52:15  
 22 300 percent within a month." Is that what happened? 13:52:21  
 23 A Yes, they more than doubled/ I don't remember 13:52:23  
 24 the exact numbers. But we know it was a very dramatic 13:52:26  
 25 increase. There was a graph shown in the briefing room. 13:52:31  
 Page 93

24 (Pages 90 - 93)

<p>1 And it shows all the arrests made for a year to the 13:52:39      2 present date, then for the year before and the present 13:52:46      3 year, and you could see -- I mean, you could see how 13:52:50      4 much larger that graph for the present year was. It 13:52:55      5 more than doubled. 13:53:01      6 Q And that was shown at a meeting at the Compton 13:53:02      7 station? 13:53:05      8 A Well, it was just posted in the briefing room. 13:53:05      9 Q And you said that Thatcher sought the assistance 13:53:09      10 of [REDACTED] and the gang. How do you know that? 13:53:15      11 A I -- well, I was partnered with Deputy [REDACTED], 13:53:17      12 who is or was -- was and probably still is [REDACTED] 13:53:27      13 girlfriend. While partnered, we conducted a traffic 13:53:33      14 stop. Another unit pulled up behind us, and normally 13:53:41      15 for the infraction that the driver had committed, we 13:53:49      16 wouldn't have arrested the driver. We would have 13:53:55      17 probably just, you know, more than likely just warned 13:53:59      18 and advised. 13:54:03      19 She started filling out a citation to cite and 13:54:04      20 release the arrest in the field, and I did ask 13:54:12      21 Deputy [REDACTED] what she was doing because, you know, this 13:54:16      22 was very unusual. And she said, "A stats a stat and, 13:54:19      23 you know, you better start -- you better start padding 13:54:23      24 your stats or getting your stats." 13:54:30      25 Q Did she say -- did she appear to be doing the 13:54:33</p>	<p>1 Q It sounds like that you are saying in your claim 13:56:04      2 that Thatcher was being controlled by this gang; is that 13:56:08      3 true? 13:56:13      4 A Well, that and, you know, word is that, you 13:56:13      5 know, we all believed that Captain Thatcher got his star 13:56:20      6 because of the gang. He was able to get promoted 13:56:24      7 because -- you know, because the gang was enforcing 13:56:27      8 these, you know, arrest quotas and stats which 13:56:32      9 ultimately, when Thatcher went back to another meeting, 13:56:34      10 you know, it shows that he had -- you know, that he was 13:56:39      11 able to bring up his stats and, you know, then after get 13:56:43      12 his star as commander. 13:56:49      13 Q So you think he became -- strike that. 13:56:50      14 Do you believe that this gang had that much 13:56:56      15 influence over the Sheriff's Department, that they can 13:56:59      16 control a captain's actions and policy within the 13:57:04      17 station and then get rewarded by being promoted to the 13:57:09      18 commander level; is that what you're saying? 13:57:14      19 A I think they have a pretty far reach within the 13:57:15      20 department. 13:57:18      21 Q I'm sorry. What's that? 13:57:18      22 A I think they have a pretty far reach within the 13:57:20      23 department, yes. 13:57:22      24 Q That is, the gang. 13:57:23      25 Okay. And I want to read this paragraph really 13:57:28</p>
<p>Page 94</p> <p>1 bidding of her boyfriend, the shot caller? 13:54:36      2 A Well, she had been given -- word was that she 13:54:39      3 had been given the heads-up a couple of weeks before so 13:54:45      4 she could pad her stats, and when the punishment came 13:54:48      5 because you're not arresting people to put you in 13:54:54      6 traffic, she would be able to show that, you know, she 13:54:57      7 had been arresting people for the last two to three 13:54:59      8 weeks. 13:54:59      9 Q How did you feel about that as far as ethics are 13:55:03      10 concerned, about arresting people who had not done 13:55:07      11 anything just to get stats up? How did you feel about 13:55:11      12 that? 13:55:14      13 A Well, it's not so much for people not doing 13:55:14      14 anything, but, you know, my opinion was, you know, 13:55:20      15 there's letter of the law and spirit of the law, and 13:55:22      16 during that period there was no spirit of the law 13:55:26      17 whatsoever. 13:55:28      18 Q Now, you say down further in that paragraph: 13:55:29      19 "During that time period, [REDACTED] would begin to make 13:55:43      20 very unusual misdemeanor arrests, usually arresting 13:55:46      21 individuals and then immediately releasing them in the 13:55:52      22 field for no other purpose but to juke the arrest 13:55:54      23 statistics as a favor from the gang to Thatcher." Is 13:55:58      24 that correct? 13:56:02      25 A Yes, sir. 13:56:02</p>	<p>Page 96</p> <p>1 quickly. "Back in 2016, Claimant attempted to get 13:57:44      2 scheduled to have certain days off so he can provide 13:57:49      3 medical care to his daughter, [REDACTED], on those days. 13:57:52      4 At this time [REDACTED] was a Training and Scheduling Deputy 13:57:55      5 who operated the station scheduling in a manner to 13:58:01      6 benefit his gang. Claimant, a non-member of the gang, 13:58:04      7 was refused these days off by [REDACTED]. Claimant had no 13:58:07      8 other option at this point but to go out on CFRA/FMLA 13:58:12      9 leave, as his superiors, with whom he discussed his 13:58:19      10 situation with, refused to or otherwise lacked the 13:58:24      11 ability to confront [REDACTED] as he was a leader of the 13:58:27      12 station gang and rarely subjected to meaningful 13:58:32      13 supervision or control by his supervisors due to his 13:58:35      14 gang ties." Is that true? 13:58:40      15 A Yes, sir. 13:58:41      16 Q And that happened to you; correct? 13:58:42      17 A Yes, sir. 13:58:46      18 Q All right. Final paragraph on this page: "At 13:58:47      19 this time gang shot caller, [REDACTED], as the Training and 13:58:55      20 Scheduling Deputy, changed Claimant's schedule to the 13:58:59      21 early morning shift to accommodate an Executioner 13:59:02      22 member, all of whom received preferential scheduling 13:59:07      23 consideration over non-gang members or associate s." Is 13:59:12      24 that true? 13:59:16      25 A Yes, sir. The deputies that he accommodated for 13:59:16</p>

<p>1 continue seeing my daughter, otherwise, I was falling on 14:05:20      2 the opposite end of the week and would be working on the 14:05:23      3 days that I would have my daughter. 14:05:26      4 Q Okay. All right. So the last sentence in that 14:05:28      5 paragraph, the last paragraph on Page 2, it says: 14:05:35      6 "Claimant protested to his supervisor, Sergeant [REDACTED]. 14:05:38      7 then the Scheduling and Training Sergeant at Compton, 14:05:43      8 but [REDACTED] refused to consider the basis for Claimant's 14:05:46      9 objection and informed him that he would support 14:05:50      10 [REDACTED] erroneous decision." Is that true, first of 14:05:53      11 all? 14:05:58      12 A Yes. 14:05:58      13 Q And why do you figure that [REDACTED] was supporting 14:05:59      14 [REDACTED] decision? Don't speculate. If you know. 14:06:07      15 A I don't know why he would -- I don't know why he 14:06:11      16 was worried. And what he told me is, "Did you talk to 14:06:16      17 [REDACTED] already?" I said, "Yes, sir, I did." And then 14:06:19      18 he said, "Well, whatever he says, I'm going to support 14:06:23      19 it." 14:06:26      20 Q Did it appear that [REDACTED] was running the 14:06:26      21 station? 14:06:31      22 A Yes. 14:06:33      23 Q Okay. Going down to the second paragraph on 14:06:34      24 Page 3, it says: "The Executioners also had a pattern 14:06:49      25 and practice of showing preference to prospective 14:06:53</p>	<p>Page 102</p> <p>1 very comfortable with them, no discipline, no bearing, 14:08:39      2 you know, things of that nature. So you start seeing 14:08:47      3 and, you know, common start, you know, to go around 14:08:50      4 saying, "Oh, he's definitely going to be a prospect when 14:08:53      5 he gets off training. Oh, I guarantee he will 14:08:57      6 definitely get off training." 14:09:00      7 Q Do you believe that they are -- that the 14:09:02      8 Executioner gang is grooming these prospects to become 14:09:06      9 Executioners? 14:09:12      10 A Yes. 14:09:12      11 Q And do you believe they're training them in 14:09:14      12 their illegal ways that you just spoke of? 14:09:20      13 A Yes. I mean, we lead by example, they say. 14:09:22      14 Q Yeah. It goes on to say: "Further prospects 14:09:29      15 are allowed to skip assignments or have their 14:09:33      16 assignments shortened to the non-preferred traffic or 14:09:37      17 Compton Town Center Mall substation detail. Claimant, 14:09:41      18 as an example, was assigned to traffic duty for a period 14:09:45      19 of 12 to 14 months as he was not interested in becoming 14:09:48      20 a gang prospect." Is that true? 14:09:52      21 A Yes. 14:09:56      22 Q Do you feel that you got a lousy assignment or a 14:09:56      23 non-preferential assignment because you showed no 14:10:04      24 interest in being a gang member? 14:10:07      25 A Yes. 14:10:09</p>
<p>1 members as soon as they were assigned to Compton." Is 14:06:56      2 that true? 14:06:59      3 A Yes. 14:06:59      4 Q "Once identified as prospects to become inked 14:07:00      5 members, newly assigned Compton deputies were allowed to 14:07:06      6 partner up with inked members right away while all other 14:07:10      7 newly minted patrol deputies were required to work by 14:07:16      8 themselves for long periods of time." Is that true? 14:07:21      9 A Yes. 14:07:23      10 Q Why do you believe -- strike that. 14:07:24      11 Why do you say that? Why are prospects allowed 14:07:25      12 to work with inked members; why do you feel that? 14:07:30      13 A Well, it was a combination of allowing, like, 14:07:35      14 for example, two prospects to jump in one car and work, 14:07:40      15 as well as they got off training and they were, you 14:07:46      16 know, able to go and work with inked members. You know, 14:07:50      17 I was -- I wasn't assigned a partner when I got off 14:07:56      18 training, and a lot of non-inked members were not 14:08:00      19 allowed -- or not allowed but weren't given that 14:08:04      20 same opportunity. 14:08:09      21 Q Let me ask you this. How are prospects 14:08:10      22 identified? How are they identified? 14:08:14      23 A Well, I mean, when they are in training, you can 14:08:19      24 see their demeanor on how they are with the 14:08:27      25 station, with, you know, inked members, very easy going, 14:08:33</p>	<p>Page 103</p> <p>1 Q Did they ever try to recruit you and say come on 14:10:10      2 to the program? 14:10:14      3 A No. 14:10:15      4 Q They just knew that you were strait-laced and -- 14:10:15      5 strike that. That calls for speculation. 14:10:19      6 Did you let everyone know at the station that 14:10:22      7 you played by the book? 14:10:25      8 A Well, I did my job. I did it -- I mean, I 14:10:27      9 believe maybe they didn't ask me because I didn't come 14:10:31      10 from Custody. I came from Court Services. But, again, 14:10:35      11 that's my reason. I don't know why they never asked me. 14:10:39      12 Maybe it's because the incident that happened between 14:10:42      13 [REDACTED] and I where I kept asking for the days off that I 14:10:45      14 needed and, you know, maybe he just didn't like me for 14:10:51      15 that. Honestly, I don't know why they never asked me, 14:10:56      16 but I was never approached. 14:10:59      17 Q Okay. So have you heard of the 3,000 Unit on 14:11:00      18 Bauchet Street? 14:11:09      19 A Say that one more time? 14:11:09      20 Q Have you heard of the 3000-level Unit in 14:11:11      21 Men's Central at Bauchet Street? 14:11:15      22 A Yes, sir. 14:11:17      23 Q Have you heard of the 2000 Unit at 14:11:18      24 Men's Central Jail at Bauchet Street? 14:11:24      25 A Yes, sir. 14:11:28</p>

1 Q Do you know whether or not, if you know, the 2 2000 or 3000 Unit deputies are sent to the Compton 3 station, if you know? 14:11:41	14:11:28	1 here about the quota system, John? 14:14:51
4 A Well, I know that they're not sent there. They 5 -- you know, the department allows you to pick a number 6 of stations, and based on your departmental seniority is 7 when you get to go to whatever pick you have depending 8 on the needs of the department. I know that a lot of 9 2000 and 3000 floor deputies desired to come to the 10 Compton station. 14:12:10	14:11:31	2 MR. SWEENEY: Yeah. 14:14:56
11 Q Okay. All right. Then it goes on to say in 12 Paragraph 3: "█████ eventually returned to Compton 13 from his IDT transfer." What is "IDT"? 14:12:23	14:12:11	3 BY MR. SWEENEY: 14:14:56
14 A Industry. That's the three-letter abbreviation 15 for City of Industry. 14:12:31	14:12:27	4 Q Yeah, let's talk about that real quickly. It 5 says: "Days after the █████ briefing where the deputies 6 were illegally ordered to meet arrest quotas or face 7 punish, Claimant, along with Deputies █████ 8 and █████, complained about the illegality of 9 the quota order to the Acting Watch Commander, 10 Sergeant █████, as an unlawful idea to punish 11 deputies with low arrest stats originated from █████ 12 and █████." Is that true? 14:15:09
16 Q Okay. "This is believed to be an act of 17 gratitude shown by Captain Thatcher to █████ for 18 assistance █████ had previously directed his gang and 19 gang associates to provide to Thatcher." 14:12:46	14:12:32	13 A Yes, sir. 14:15:13
20 Now, how do you know this? I want to know why 21 this isn't just speculation. How do you know this? 14:12:49	14:12:49	14 Q You saw that happen? 14:15:18
22 A Well, I did ask Lieutenant █████, you know. I 23 heard -- and, you know, the word goes out quick. This 24 is worse in high school. Word goes out quick. "Hey, 25 there's word that Juarez is coming back to Industry." I	14:12:55	15 A Yes, sir. I was there, yes. 14:15:24
	14:13:06	16 Q "When confronted by the deputies and asked if 17 undesirable assignments were being improperly used as 18 punishment for not meeting illegal quotas, █████ 19 admitted, 'Yes, you should have known that by 20 now.'" Did you hear him say that? 14:15:29
	Page 106	21 A Yes. 14:16:00
1 hear from one or two deputies, and then I ran into 2 Lieutenant █████ in the parking lot, and I asked him, 3 "Hey, sir, we're hearing that █████ is coming back." 4 And all he said was, "Not my call." 14:13:20	14:13:09	22 Q "█████ further stated that if someone had a 23 problem with the new quota program, that they were 24 welcome to come to his office so that █████ could show 25 them their low stats." Did he say that? 14:16:12
5 Q All right. Then we talked about the reference 6 in the office in August of 2017. We'll skip over it and 7 go quickly. 14:13:35	14:13:22	Page 108
8 "Several weeks later, Lieutenant █████ held 9 a briefing and informed all deputies that their stats 10 were low compared to other stations in the 11 division. Claimant was present when █████ told all the 12 deputies present in the briefing that it was their job 13 to arrest people, 'so go do your job.' After this 14 meeting deputies with low arrest numbers were retaliated 15 against and punished by having to work undesirable 16 details such as working the front desk, traffic detail, 17 or Compton Town Center Mall substation." Is that true? 14:14:05	14:13:38	1 A Yes. 14:16:16
18 A Yes, sir. 14:14:11	14:13:42	2 Q You heard him? 14:16:16
19 Q That happened? 14:14:11	14:13:47	3 A Yes, sir. 14:16:18
20 A Yes, sir. 14:14:12	14:13:52	4 Q It goes on to say: "█████ raised his voice to 5 Claimant and Deputies █████ and █████ and told them to 6 'do your job, I'm trying to save your career.'" How did 7 you take that, sir? 14:16:18
21 Q Moving on -- what I'm trying to do, Deputy, is 22 go over things that are not relevant to what I want to 23 talk about. 14:14:41	14:14:13	8 A Well, I mean, go get arrests, you know, go get 9 your stats or else. I mean, it's a little vague, you 10 know, when he says to save your career but, to me, that 11 sounds like if I don't get arrest quotas, then -- I 12 don't know -- I may not get promoted, I may not go to a 13 good assignment, I may not ever get out of traffic. 14:16:27
24 A Yes, sir. 14:14:42	14:14:49	14 Q Okay. Let me finish this paragraph and we'll 15 take a five-minute break. 14:17:06
25 MR. GLICKMAN: Do you want to do this last paragraph	Page 107	16 "As a result of this interaction" -- I'm 17 sorry. It goes on to say: "Alcala protested and said 18 he was doing his job, to service calls for assistance 19 from the public. As a result of this interaction, 20 Claimant, █████, and █████ were all reprimanded as 21 punishment for protesting the illegal quota program and 22 were demoted and immediately put on a rotation to 23 traffic duty." Is that true? 14:17:12
		24 A Yes. It's not demoted. They were punished -- 25 we were punished in a way where we weren't able to work 14:17:42
		Page 109

<p>1 a crime car and we were put in traffic in a traffic car. 14:17:52      2 Q Okay. It goes on to say: "█████ had been 14:17:56      3 slated to promote to Special Assignments Office at 14:18:01      4 Compton, but after he protested to █████ informed 14:18:04      5 the sergeant, commanding SAO, to refuse the transfer to 14:18:08      6 █████" Is that true? 14:18:13      7 A Yes, sir. 14:18:14      8 MR. SWEENEY: All right. Why don't we take a 14:18:15      9 five-minute break and pick up here? Is that okay with 14:18:17      10 everybody? 14:18:20      11 MR. IVIE: Yeah. 14:18:22      12 MR. SWEENEY: Okay. 14:18:23      13 THE VIDEOGRAPHER: This marks the end of 14:18:24      14 Media No. 5. The time is 2:18 p.m., and we are off the 14:18:27      15 record. 14:18:29      16 (Recess taken from 2:18 p.m. to 2:29 p.m.) 14:29:24      17 THE VIDEOGRAPHER: This starts the beginning of 14:29:24      18 Media No. 6. The time is 2:29 p.m., and we are on the 14:29:27      19 record. 14:29:30      20 BY MR. SWEENEY: 14:29:30      21 Q Okay. The next paragraph says in your 14:29:32      22 Exhibit 105: "Due to this illegal arrest quota 14:29:39      23 regime, average arrests per deputy immediately went from 14:29:48      24 approximately 2.5 arrests per month to approximately 14:29:52      25 7 arrests per month." Is that true? 14:29:57</p>	<p>1 complaining was not going to get us anywhere. In fact, 14:31:40      2 Lieutenant █████ came to one of our briefings and said 14:31:51      3 to stop complaining to the union and to do our F'ing 14:31:55      4 jobs, so there was nowhere to go and complain. 14:32:08      5 Q Okay. It goes on to say on October 25th -- 14:32:11      6 MR. GLICKMAN: You skipped a line. 14:32:25      7 BY MR. SWEENEY: 14:32:27      8 Q I'm sorry. "Finally, Thatcher called a meeting 14:32:27      9 with patrol deputies and told them he was pleased with 14:32:31      10 the results and new artificially inflated arrest 14:32:34      11 figures." Did you hear him say that? 14:32:38      12 A He went to a briefing and -- he went to a 14:32:40      13 briefing, and then a sergeant told us that he was 14:32:49      14 pleased, that he was, you know, happy, that he went back 14:32:52      15 to a division meeting and that it was good news. 14:32:54      16 Q Okay. And so this good news was brought about 14:33:00      17 by Thatcher to elicit the help of these gangsters; is 14:33:07      18 that true? 14:33:12      19 A Yes. 14:33:13      20 Q It goes on to say: "On October 25th, 2019, 14:33:13      21 Claimant was recognized for his long and diligent 14:33:19      22 service by being promoted to Field Training 14:33:22      23 Officer. Claimant received a 5 percent FTO pay 14:33:26      24 increase." Is that true? 14:33:29      25 A Yes, sir. 14:33:30</p>
<p style="text-align: right;">Page 110</p>	<p style="text-align: right;">Page 112</p>

<p>1 A Approximately, yes. 14:30:01      2 Q How do you know that? 14:30:03      3 A They posted those graph bars at the station 14:30:04      4 showing, you know, the arrests from, you know, the 14:30:12      5 beginning of the year to the present time then, and it 14:30:16      6 showed what it was the prior month which was about, 14:30:21      7 like, three, and then it more than doubled the following 14:30:26      8 month. We all laughed because we thought, wow, you 14:30:30      9 know, they're getting their stats. 14:30:34      10 Q Okay. And it goes on to say: "This resulted in 14:30:37      11 the violation of the civil rights of hundreds of 14:30:42      12 residents of the Compton patrol area for no other reason 14:30:45      13 but to insulate Thatcher from criticism from his 14:30:50      14 division." Is that what you -- is that true? 14:30:54      15 A Yes. It was to bring our stats up to show the 14:30:59      16 division. 14:31:03      17 Q And did you complain to anyone that, look, 14:31:05      18 you've got citizens, these are citizens and they're 14:31:08      19 being arrested, they may be disenfranchised, they may 14:31:11      20 not be able to get jobs, they're young men or young 14:31:16      21 women; did you complain to them that this is wrong? 14:31:20      22 A I mean, I complained to my peers. I knew that 14:31:22      23 after speaking with Sergeant █████ and after 14:31:26      24 Lieutenant █████ and Lieutenant █████ told us to do 14:31:31      25 our jobs and go out there and do our jobs, I knew that 14:31:35</p>	<p>1 Q "Claimant's first trainee was 14:33:31      2 Deputy █████." Is that true? 14:33:34      3 A Yes, sir. 14:33:35      4 Q "Master Field Training Officer █████ 14:33:36      5 commended Claimant for doing a good job of timely 14:33:41      6 turning in his training daily observation reports." Is 14:33:44      7 that true? 14:33:48      8 A Yes. 14:33:48      9 Q "On February 13, 2020, a month after Claimant 14:33:49      10 completed his training of █████ MFTO █████ told 14:33:53      11 Claimant to report to █████ -- I'm sorry -- "to 14:33:59      12 report to the LASD patrol school so that Claimant could 14:34:03      13 have the first opportunity to pick his next trainee." 14:34:09      14 Is that true? 14:34:11      15 A Yes, sir. 14:34:12      16 Q "█████ was an ideal patrol candidate and had 14:34:12      17 excelled in and completed all but his final training 14:34:17      18 phase." Is that true? 14:34:22      19 A Yes, sir. 14:34:23      20 Q It goes on to say: "At this time he was failed 14:34:23      21 out of training by inked Executioner member 14:34:26      22 Deputy █████" Is that true? 14:34:31      23 A Yes, sir. 14:34:34      24 Q Why do you believe that █████ was retaliated 14:34:35      25 against? 14:34:44</p>
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1 A Because he came from day shift, he came from -- 14:34:44  
2 you know, he came from me as his training officer. And 14:34:47  
3 it was a known belief that day shift was lazy, that we 14:34:51  
4 didn't do anything, that we were lazy and -- well, to be 14:34:58  
5 quite honest, because I'm not an inked member. 14:35:05  
6 And I saw this coming. I even told [REDACTED] to 14:35:06  
7 make sure that he was working hard and doing everything 14:35:12  
8 he was told so he could complete his training and not 14:35:14  
9 give anybody the excuse to roll him up and fail him in 14:35:21  
10 patrol training. 14:35:24  
11 Q It goes on to say: "Thereafter, gang member 14:35:25  
12 Deputy [REDACTED] had returned to Compton after a 14:35:36  
13 temporary assignment to the Internal Affairs Bureau. 14:35:40  
14 Upon his return, he began extremely aggressive bullying 14:35:43  
15 behavior towards other deputies with the intent of 14:35:46  
16 raising his standing within the gang. [REDACTED] is 14:35:49  
17 presently on the list to promote to sergeant at 14:35:53  
18 Compton." 14:35:56  
19 Now, are you telling me -- you already said that 14:35:58  
20 [REDACTED] was an inked Executioner; is that correct? 14:36:02  
21 A Well, he does not have a tattoo, but he is a 14:36:06  
22 member of the group. 14:36:09  
23 Q Well, how do you know he doesn't have a tattoo? 14:36:10  
24 A Because -- well, I mean, I had never seen one on 14:36:14  
25 him. 14:36:18

Page 114

1 duty. This assault was intended to further the 14:37:59  
2 reputation of the gang in Compton." Is that true? 14:38:03  
3 A Yes. 14:38:05  
4 Q You already told us about this assault early on 14:38:05  
5 a couple of hours ago; correct? 14:38:08  
6 A Yes, sir. 14:38:09  
7 Q It goes on to say: "On February 8, 2020, 14:38:09  
8 [REDACTED] texted Claimant" -- that's you -- "who was 14:38:12  
9 another fellow Field Training Officer and informed him 14:38:18  
10 of [REDACTED] violent conduct. Claimant was familiar 14:38:22  
11 with the aggressive behavior of [REDACTED], who Claimant 14:38:25  
12 knew to be inked." 14:38:30  
13 So you knew he was inked. Did you know or -- 14:38:32  
14 but you just didn't see it? 14:38:37  
15 A I couldn't hear it. Repeat that question one 14:38:41  
16 more time? 14:38:44  
17 Q I'm just reading. It says: "Claimant was 14:38:45  
18 familiar with the aggressive behavior of [REDACTED], who 14:38:48  
19 Claimant knew to be inked." 14:38:51  
20 A I knew he was inked. He was inked prior to the 14:38:54  
21 incident with [REDACTED]. 14:39:00  
22 Q Okay. "A few days later, Claimant fulfilled his 14:39:01  
23 obligation to report this violent incident anonymously 14:39:08  
24 to IAB." 14:39:11  
25 Is that your duty as an officer or as a deputy, 14:39:13

Page 116

1 Q Oh. 14:36:19  
2 A But, again, it's common knowledge within the 14:36:20  
3 station, and to my surprise, it was that he is a member 14:36:24  
4 of the group. 14:36:28  
5 Q Okay. So if he is a member of the group, what 14:36:29  
6 you're saying is in this claim is that he went all the 14:36:34  
7 way up to the IAB, the Internal Affairs Bureau; correct? 14:36:38  
8 A He went on loan to the Internal Affairs Bureau. 14:36:43  
9 And I'm not sure if it was Internal Affairs Bureau or 14:36:46  
10 Internal Criminal Affairs Bureau. And he went there on 14:36:52  
11 loan for I believe it was 12 months as a -- like part of 14:36:53  
12 the surveillance team. 14:37:01  
13 Q So this possibly inked gang member is active or 14:37:02  
14 was active in IAB, correct, even though temporarily? 14:37:09  
15 A That is correct. 14:37:13  
16 Q It goes on to say: "[REDACTED] is presently on 14:37:14  
17 the list to promote to sergeant." Is that true? 14:37:20  
18 A He tested for sergeant. I know he placed -- I 14:37:23  
19 don't know exactly where he placed, but he was on the 14:37:29  
20 list or is on a list to promote to sergeant. 14:37:31  
21 Q Wow. It goes on to say: "In February 200, 14:37:35  
22 [REDACTED], now an FTO, Field Training Officer, 14:37:40  
23 threatened fellow Field Training Officer 14:37:46  
24 Deputy [REDACTED] with violence. This led to an 14:37:49  
25 altercation in which [REDACTED] assaulted [REDACTED] on 14:37:54

Page 115

1 when you see wrong, say so? 14:39:19  
2 A Well, I think that it's every Deputy Sheriff's 14:39:21  
3 duty, to report incidents like this. Me being a field 14:39:27  
4 training officer, you know, I'm a supervisor and I have 14:39:32  
5 to report this behavior. 14:39:37  
6 Q As a matter of fact, if certain behavior had 14:39:40  
7 been reported in Minneapolis, maybe George Floyd would 14:39:47  
8 be alive; correct? I'll withdraw that question. 14:39:50  
9 Anyway. 14:39:50  
10 "A few days later, Claimant fulfilled his 14:39:54  
11 obligation to report this violent incident anonymously 14:40:02  
12 to IAB." Is that what you did? 14:40:07  
13 A Yes, sir. 14:40:10  
14 Q Then it says: "As Claimant would later learn, 14:40:10  
15 there was nothing confidential about this report as the 14:40:15  
16 Executioner gang had infiltrated IAB and would later 14:40:19  
17 obtain a recording of his voice making the anonymous 14:40:24  
18 phone call to IAB." How do you know that? 14:40:28  
19 A I believe it was on the day that I went to 14:40:31  
20 monitor my new trainee that I was going to get in 14:40:39  
21 February. I was at the Star Center in Whittier 14:40:43  
22 monitoring the trainees that were coming. That same 14:40:52  
23 day, Deputy [REDACTED] and among other deputies from the 14:40:55  
24 station were at a class, some training class at the same 14:41:01  
25 facility. 14:41:05

Page 117

1 Deputy █ had told me that he was approached 14:41:10  
2 by Deputy █, and Deputy █ told Deputy 14:41:13  
3 █, "What's up with your boy █ We know he's 14:41:17  
4 the one who called IA, and we can't get to get our hands 14:41:20  
5 on the voice print." 14:41:26  
6 Q We can't get our hands on the what? 14:41:28  
7 A "We can't wait to get our hands on the voice 14:41:28  
8 print." 14:41:32  
9 Q Okay. 14:41:33  
10 A Deputy █ called me and he told me to be 14:41:34  
11 careful as Deputy █ was the only person who knew 14:41:39  
12 that I had called Internal Affairs to report this 14:41:44  
13 assault. Deputy █ told me, "Be very careful. They 14:41:47  
14 know it was you." I asked him, "How do they know," and 14:41:51  
15 he said he didn't know and again repeated that they 14:41:55  
16 couldn't wait to get their hands on the voice print. 14:41:57  
17 That really scared me. When I heard that, it was -- you 14:42:00  
18 know, it got very real for me. 14:42:03  
19 Q Did you fear for your life at that point? 14:42:06  
20 A Absolutely, I feared for my safety. I mean, 14:42:10  
21 just right away, I just couldn't stop thinking about the 14:42:14  
22 whole thing, and I just didn't know what to do. 14:42:18  
23 Q Did you feel -- at that point did you feel that 14:42:22  
24 this Executioners gang was capable of murder? 14:42:28  
25 A Maybe not them directly, but maybe through a 14:42:33

Page 118

1 department, not the executives, you know, are that 14:44:01  
2 way. Do I believe that there is one or two bad apples? 14:44:06  
3 Absolutely, yes. 14:44:12  
4 Q And being bad apples -- or there's actually more 14:44:12  
5 than one or two bad apples at Compton; correct? 14:44:18  
6 A Yes. 14:44:21  
7 Q And as you said, they run the station; correct? 14:44:21  
8 A Yes, sir. 14:44:24  
9 Q Okay. Do you feel that there was -- there could 14:44:25  
10 have been some type of corrective measure taken to 14:44:37  
11 eradicate this gang at some point when the Captain found 14:44:43  
12 out about how they were controlling things? 14:44:47  
13 A Yes, absolutely. 14:44:49  
14 Q What do you think could have been done? 14:44:51  
15 A I mean, not bring █ back to the station, 14:44:54  
16 number one. 14:44:59  
17 Q What? 14:45:01  
18 A Not bringing Deputy █ back to the 14:45:03  
19 station -- 14:45:05  
20 Q Oh. 14:45:05  
21 A -- after he was transferred. I think that was a 14:45:06  
22 bad move. I think, if anything, rather than showing 14:45:09  
23 that they're correcting things, they're -- you know, 14:45:12  
24 they're helping it. And I think not just the station, 14:45:18  
25 not just the division, but I think the department has 14:45:24

Page 120

1 third party. I mean, that did cross my mind, you know, 14:42:38  
2 these gang members that they jam up, you know, would it 14:42:42  
3 be crazy to think that maybe they hire one of them to 14:42:46  
4 come and do a hit on me? Absolutely, that did cross my 14:42:49  
5 mind. 14:42:53  
6 Q It goes on to say: "Within two days of the 14:42:53  
7 anonymous call, inked members of The Executioners 14:42:59  
8 already knew it was Claimant who made the call." You 14:43:02  
9 just testified about that. 14:43:05  
10 "While at a patrol school training, Claimant was 14:43:06  
11 mortified when Deputy █ informed him that 14:43:09  
12 'The Executioners are saying that it was you who called 14:43:12  
13 IA, and they can't wait to get their hands on the voice 14:43:16  
14 print of the call.'" You just testified to that; 14:43:19  
15 correct? 14:43:21  
16 A Yes. 14:43:21  
17 Q "Claimant immediately realized that as █ 14:43:22  
18 previously worked at IAB, that a former co-worker at IAB 14:43:25  
19 had illegally warned █ of the complaint. This 14:43:30  
20 put Claimant at severe risk of violent reprisal by the 14:43:34  
21 gang so Claimant took several days off of work." 14:43:38  
22 So would you say that the Sheriff's Department 14:43:46  
23 is crooked in the upper levels, including IAB, based on 14:43:48  
24 this incident? 14:43:56  
25 A Obviously, not everyone, not the whole 14:43:59

Page 119

1 had -- it's not the first complaint coming from this 14:45:26  
2 group, you know. Yeah, what needs to happen? 14:45:30  
3 Q Okay. It goes on to say: "After returning to 14:45:37  
4 work after several days off, Claimant was still 14:45:44  
5 struggling to process all this information." So you 14:45:48  
6 confided in your Operations Lieutenant, Lieutenant █; 14:45:52  
7 is that correct? 14:45:58  
8 A Yes, sir. 14:45:58  
9 Q "That he was the one who had called IAB 14:45:59  
10 regarding █" Is that what you told him? 14:46:03  
11 A Yes, I told him that I had been the person who 14:46:06  
12 had anonymously called IA. 14:46:09  
13 Q Okay. And remind me, █, he wasn't tattooed; 14:46:11  
14 right? 14:46:25  
15 A No, not him, no. 14:46:25  
16 Q Okay. "And Claimant wanted to remain anonymous 14:46:28  
17 to the extent possible. Claimant found" -- is that 14:46:34  
18 true? 14:46:38  
19 A Yes. 14:46:38  
20 Q "Claimant found himself in a worst case 14:46:38  
21 scenario, as the entire Compton station knew it was him 14:46:42  
22 who had reported an inked member of The Executioners to 14:46:47  
23 IAB." 14:46:49  
24 Okay. Wait. So in reading this, you confided 14:46:51  
25 in Lieutenant █ that you were the one who called IAB. 14:46:57

Page 121

1 Are you saying that Lieutenant [REDACTED] spilled that to the 14:47:05  
2 gang; is that what you're saying? 14:47:09  
3 A No, no. I notified Lieutenant [REDACTED], and he 14:47:11  
4 notified the captain regarding this. I believe a couple 14:47:15  
5 of days later, I had a talk with the captain. 14:47:20  
6 Q Captain who? 14:47:27  
7 A Captain [REDACTED], our current captain. 14:47:27  
8 Q Okay. 14:47:30  
9 A At the time she -- you know, she was supportive 14:47:30  
10 and asked me if I wanted to talk to two investigators 14:47:37  
11 that were investigating this incident. She said I 14:47:41  
12 didn't have to, but I believe she gave me their phone 14:47:46  
13 number and asked me if it was okay for her to give them 14:47:52  
14 my phone number, and I told her it was. And I don't 14:47:56  
15 think initially she gave the phone number to them. 14:48:03  
16 A couple of days later, I was working, and these 14:48:06  
17 two investigators came to the station and went to 14:48:11  
18 dispatch and told them to have me come back to the 14:48:16  
19 station from the field. The watch deputy that day was 14:48:20  
20 an inked member Anthony [REDACTED], who didn't call me to 14:48:28  
21 tell me, "Hey, there are two detectives here who want to 14:48:33  
22 talk to you." He called my partner that day, 14:48:36  
23 Deputy [REDACTED], and relayed the message through 14:48:40  
24 him. 14:48:43  
25 I went back to the station and met with these 14:48:45

Page 122

1 BY MR. SWEENEY: 14:50:11  
2 Q So now we have an inked member, as you say, 14:50:11  
3 running the station, and we have inked members in 14:50:15  
4 dispatch too? 14:50:18  
5 A Yes. In fact, [REDACTED] girlfriend, she 14:50:19  
6 worked in dispatch. 14:50:25  
7 Q Okay. And then we have inked members in the 14:50:26  
8 Internal Affairs Bureau also; correct? 14:50:32  
9 A Well, there was one on loan to them. 14:50:34  
10 Q Right. Were the ones who got word back to the 14:50:37  
11 station that you had made a complaint; correct? 14:50:43  
12 A Well, it had to have been. I called 14:50:46  
13 Internal Affairs to report the incident anonymously, and 14:50:48  
14 a couple of days later everybody knew at my station that 14:50:52  
15 I was the one who had called. 14:50:56  
16 Q And then, of course, Captain Thatcher was using 14:50:57  
17 the gang to get statistics up, as you testified; 14:51:01  
18 correct? 14:51:07  
19 A Correct. 14:51:07  
20 Q It sounds to me that every aspect of the Compton 14:51:08  
21 station is controlled by this gang; am I making a 14:51:12  
22 correct statement? 14:51:17  
23 A For the most part, yes. 14:51:18  
24 Q It goes on to say that you took a week off, and 14:51:20  
25 during the week off, Deputy [REDACTED] texted a message to 14:51:31  
Page 124

1 two investigators, and my first complaint was why they 14:48:48  
2 came to the station asking for me and making it more 14:48:52  
3 obvious that I was the one who had called IA. 14:48:56  
4 Q So these two investigators, it appears from what 14:48:58  
5 you're saying, were handling the plan to out you as the 14:49:05  
6 person who made this complaint against The Executioners? 14:49:15  
7 A I don't know if that was their intent. To me, 14:49:19  
8 as an investigator, it wasn't the smartest move. It 14:49:23  
9 wasn't the smartest way to meet with somebody. I think 14:49:26  
10 they could have gone a different route to meet with me, 14:49:30  
11 but especially not meet with me at the station. 14:49:37  
12 MR. ROMERO: Mr. Sweeney, may I ask one question of 14:49:41  
13 the witness? 14:49:46  
14 MR. SWEENEY: Sure. Who is this? 14:49:46  
15 MR. ROMERO: This is [REDACTED]. I'm sorry. I'm 14:49:46  
16 off camera. 14:49:48  
17 MR. SWEENEY: Oh, sure. 14:49:50  
18 MR. ROMERO: Deputy [REDACTED] was there also 14:49:53  
19 interaction between the Internal Affairs investigator 14:49:56  
20 with an inked member of the gang in dispatch where the 14:49:56  
21 inked member of the gang was the one who relayed the 14:49:59  
22 message that investigators were there to see you? 14:50:01  
23 THE WITNESS: Yeah. That's -- yes, yes. 14:50:04  
24 MR. ROMERO: Who was that inked member at dispatch? 14:50:06  
25 THE WITNESS: It was [REDACTED]. 14:50:09

Page 123

1 you and a photo of graffiti in a very visible in the 14:51:36  
2 station which read, "[REDACTED] is a rat"; is that true? 14:51:41  
3 A Yes, sir. 14:51:44  
4 Q And where was that? 14:51:45  
5 A It was on the keypad of the gate to get in at 14:51:48  
6 the station. 14:51:51  
7 Q And if you drove there, and everybody drove 14:51:51  
8 there, you had to see that "[REDACTED] is a rat" to get into 14:51:55  
9 the station; correct? 14:51:59  
10 A Including supervisors, yes. 14:52:00  
11 Q Okay. 14:52:02  
12 MR. ALTURA: Where is that, Mr. Sweeney? I lost it 14:52:07  
13 there. What page are you on? 14:52:10  
14 MR. SWEENEY: I'm on the second paragraph, Page 5 of 14:52:11  
15 10, where you see in all caps, "[REDACTED] is a rat." 14:52:16  
16 MR. ALTURA: Thank you. 14:52:21  
17 BY MR. SWEENEY: 14:52:24  
18 Q And you said: "This had the practical effect of 14:52:24  
19 calling the integrity of the entire IAB and anonymous 14:52:28  
20 reporting program into question"; is that correct? 14:52:33  
21 A Yes. 14:52:35  
22 Q So do you feel that because you were outed, that 14:52:36  
23 it is a deterrent to reporting any nefarious or bad 14:52:44  
24 activities of this gang? 14:52:52  
25 A Well, who do I go to? 14:52:53

Page 125

1 Q Yup, yup. Okay. Okay. I'm going to skip down. 14:52:57	1 Q So it sounds like it paid to be an Executioner; 14:56:54
2 I'm going to skip over your statements to investigators 14:53:26	2 is that correct? 14:56:59
3 and go down to the last paragraph on Page 5. 14:53:30	3 A Yes, sir. 14:56:59
4 "In late February 2020, after returning from 14:53:36	4 Q It literally paid. You got more money as an 14:57:00
5 this week off from work, Claimant was approached by 14:53:39	5 Executioner; correct? 14:57:03
6 Scheduling Sergeant [REDACTED]" Is that true? 14:53:42	6 A Yes. 14:57:04
7 A Yes. 14:53:45	7 Q And if you weren't an Executioner, like you are 14:57:04
8 Q And you were taken upstairs to the conference 14:53:46	8 not, you lost your 5 percent pay raise; correct? 14:57:10
9 room; true? 14:53:50	9 A Yes. 14:57:15
10 A Correct. 14:53:50	10 Q So am I correct in saying that there's money in 14:57:15
11 Q "[REDACTED] reprimanded Claimant for taking 14:53:51	11 the bank to be an Executioner? 14:57:19
12 intermittent CFRA/FMLA three to five days per month to 14:53:55	12 A Yes, I believe that if I would have been a 14:57:21
13 care for his ill daughter, [REDACTED]" Is that true? 14:53:59	13 member of that group, I would still be a training 14:57:25
14 A That is correct. 14:54:02	14 officer at the station. 14:57:28
15 Q "[REDACTED] informed Claimant that he was being 14:54:03	15 Q It goes on to say that "Claimant believed that 14:57:29
16 demoted from his FTO position." Did that happen? 14:54:06	16 [REDACTED] exercised the power of the gang to control who 14:57:36
17 A No, not demoted, just not giving me any more 14:54:09	17 would be eligible for an FTO position and to retaliate 14:57:43
18 trainees which in turn meant no more 5 percent raised 14:54:12	18 against Claimant as a result of his IAB complaint 14:57:44
19 pay. 14:54:16	19 against the gang." You wrote that or you said that? 14:57:47
20 Q So did you feel that your going against the 14:54:16	20 A Yes. 14:57:51
21 wishes and getting on the bad side of The Executioners 14:54:24	21 Q And then in the next paragraph, you say: "As of 14:57:52
22 cost you that 5 percent raise? 14:54:28	22 now, no other deputy at Compton will be a partner with 14:58:02
23 A Absolutely, yes. 14:54:35	23 Claimant due to his being targeted for retaliation by 14:58:05
24 Q And did you feel that you had to choose between 14:54:37	24 The Executioners." Did you say that? 14:58:10
25 The Executioners desires and your daughter, [REDACTED]? 14:54:42	25 A Yes. There was one deputy that did partner up 14:58:12
Page 126	Page 128
1 A Say that again? 14:54:46	1 with me. 14:58:14
2 Q Did you feel at some point you had to choose 14:54:49	2 Q Okay. And why do you believe that other -- if 14:58:15
3 between the desires of The Executioners and doing what 14:54:52	3 you know. Don't speculate. If you know, why -- strike 14:58:21
4 they say and becoming a member versus caring for your 14:54:57	4 that. Let me ask this question. 14:58:27
5 daughter; did you feel that way? 14:55:02	5 Has anybody told you at the Compton station, 14:58:29
6 A Well, yes. I mean, I was taking intermittent 14:55:03	6 "Hey, I don't want to be a partner with you because you 14:58:32
7 days of FMLA, and they used this excuse to not give me 14:55:07	7 are being targeted by The Executioners"? 14:58:37
8 trainees anymore, but it was very obvious with the 14:55:13	8 A Yes. 14:58:39
9 timing that that wasn't the case. The Executioners 14:55:19	9 Q Who told you that? 14:58:40
10 didn't want me to be a TO anymore, and instead they 14:55:23	10 A It was Deputy [REDACTED]. 14:58:42
11 wanted their prospects to become temporary TO's, as they 14:55:28	11 Q Deputy who? 14:58:48
12 call them, to be training officers and get rid of me. 14:55:34	12 A [REDACTED]. 14:58:49
13 Q Getting down to it -- and I'm trying to 14:55:39	13 Q [REDACTED] Okay. [REDACTED]? 14:58:50
14 eliminate some of the things in the claim that may be 14:55:54	14 A Correct. And it was Deputy [REDACTED]. 14:58:54
15 relevant to your employment claim and not necessarily 14:55:59	15 Q Did they tell you they were frightened by this 14:58:59
16 this, so forgive me and bear with me one second. Can 14:56:03	16 gang? 14:59:03
17 you do that? 14:56:09	17 A They told me that they just basically wanted to 14:59:03
18 A Yes. No problem, sir. 14:56:09	18 stay away from jumping in with me because of what was 14:59:06
19 Q It goes on in the second paragraph of Page 6 at 14:56:25	19 going on. 14:59:09
20 the end, it says: "On or about this time, 14:56:29	20 Q It goes on to say: "Further, the inked deputy 14:59:10
21 Sergeant [REDACTED] authorized the hiring of temporary 14:56:40	21 in dispatch, [REDACTED], began a pattern and practice with 14:59:18
22 FTOs and the temporary FTO position was offered to 14:56:44	22 slamming Claimant with excessive calls compared to other 14:59:22
23 [REDACTED] and other members or prospects of 14:56:50	23 deputies on the same shift." What does "slamming" mean? 14:59:26
24 The Executioners." Is that correct? 14:56:53	24 A Slamming is they give you -- you know, they're 14:59:27
25 A Yes, sir. 14:56:54	25 not spreading the calls evenly with the other units. 14:59:30
Page 127	Page 129

1 A That was an allegation, yes. It was a 2 station-level complaint. 17:00:29	17:00:33	1 the tattoo of the group was The Executioners. 17:03:18	17:03:24
3 Q And were you suspended -- 17:00:34		3 lawyer, John Sweeney; isn't that right? 17:03:28	
4 A No. 17:00:36		4 A I beg your pardon? 17:03:31	
5 Q -- as a result of that complaint? 17:00:37		5 Q I said you learned about that name from the 17:03:33	
6 A No, sir. 17:00:40		6 plaintiff lawyer in the case, John Sweeney? 17:03:36	
7 Q You had no discipline whatsoever? 17:00:41		7 A No. I learned about The Executioners name at 17:03:38	
8 A No, sir. 17:00:43		8 the station among deputies. 17:03:41	
9 Q Now -- 17:00:43		9 Q What deputy did you know that told you about 17:03:42	
10 THE VIDEOGRAPHER: I'm sorry. This is the 17:01:01		10 The Executioners tattoo? 17:03:47	
11 videographer. So we have the witness and his attorney 17:01:03		11 A It was in a group, you know, like a circle of 17:03:50	
12 in the screen. I want to make sure that you're okay 17:01:05		12 deputies near a patrol car, and I don't remember which 17:03:53	
13 with that because normally it's just the witness. 17:01:08		13 one is the one who said, "Hey, you know, they're name is 17:03:58	
14 MR. IVIE: I think that's what it's supposed to be is 17:01:12		14 Executioner. Can you believe that?" 17:04:01	
15 the witness. 17:01:15		15 Q How many deputies -- how many deputies were 17:04:03	
16 THE VIDEOGRAPHER: Right. And if we can just make 17:01:21		16 around that circle? 17:04:05	
17 sure that the witness stays in the center of the screen, 17:01:23		17 A I think maybe three or four. 17:04:06	
18 that would be perfect. Thank you. 17:01:25		18 Q And who were they? 17:04:09	
19 BY MR. IVIE: 17:01:27		19 A I don't remember, sir. 17:04:11	
20 Q Is there another popular tattoo at Compton that 17:01:40		20 Q And how did they know that the name was 17:04:12	
21 features a character holding an axe? 17:01:46		21 The Executioners? 17:04:18	
22 A There was word that there was one, and they used 17:01:50		22 A Well, I asked, "Confirmed?" And they said, "Oh, 17:04:19	
23 to call it, I guess, the old ink or something like 17:01:55		23 yes, confirmed." 17:04:23	
24 that. 17:01:58		24 Q You asked what? What did you ask? 17:04:25	
25 Q Have you seen any deputies with that tattoo? 17:01:58		25 A I don't remember how -- I don't know how they 17:04:27	
	Page 186	Page 188	

1 A No, sir. 17:02:04		1 got that information. 17:04:30	
2 Q And you say you know all the deputies that work 17:02:04		2 Q But they gave you the information? 17:04:31	
3 at Compton? 17:02:12		3 A Yes, sir. 17:04:33	
4 A I know them, yes. 17:02:13		4 Q You don't know whether or not they read it in a 17:04:34	
5 Q And how many deputies work at Compton? 17:02:15		5 newspaper? 17:04:37	
6 A It's hard to tell. That's a good question. I 17:02:18		6 A I do not know that, sir, no. 17:04:38	
7 wouldn't -- 17:02:23		7 Q You understand, you realize that Mr. Sweeney 17:04:40	
8 Q Is there maybe about a hundred deputies that 17:02:24		8 gave a press conference after that deposition, and then 17:04:43	
9 work at Compton? 17:02:27		9 Mr. Sweeney used the name Executioners? 17:04:49	
10 A Around there, yes. 17:02:29		10 A I didn't. 17:04:53	
11 Q And you say there are about 20 of them with a 17:02:30		11 MR. SWEENEY: No, I didn't, Mr. Ivie. 17:04:55	
12 tattoo? 17:02:33		12 BY MR. IVIE: 17:04:58	
13 A With The Executioners tattoo, about 20. I would 17:02:33		13 Q All right. So -- 17:04:58	
14 calculate maybe 15, 20. 17:02:37		14 MR. SWEENEY: You're incorrect with that, Mr. Ivie. 17:05:01	
15 MR. SWEENEY: You're referring to The Executioners 17:02:43		15 You're making that up. 17:05:03	
16 tattoo and not the one with the axe; correct? 17:02:45		16 MR. IVIE: No, I'm not. You've said that several 17:05:05	
17 MR. IVIE: Right. I'll call that the subject tattoo. 17:02:48		17 times. 17:05:08	
18 BY MR. IVIE: 17:02:48		18 MR. SWEENEY: Well, no. That press conference where 17:05:09	
19 Q Speaking of the word "Executioner", you say you 17:02:52		19 I announced to the world, there was a clip, and I did 17:05:15	
20 heard -- you first heard of that name about six months 17:02:55		20 not use the word "Executioners" because I didn't know. 17:05:18	
21 ago? 17:02:57		21 But, anyway, continue on. 17:05:22	
22 A No. I heard The Executioners name, it was 17:02:58		22 BY MR. IVIE: 17:05:23	
23 really after the incident with the deposition of 17:03:04		23 Q So let me ask you this. You were with three 17:05:24	
24 Deputy Aldama where they showed his tattoo in the media. 17:03:11		24 deputies, and somebody said the name was Executioners, 17:05:26	
25 After that, at the station I learned that the name of 17:03:15		25 and you don't know where that came from, you don't know 17:05:29	
	Page 187	Page 189	

1 how they learned?	17:05:33	1 A Yes, sir.	17:07:40
2 A I don't know how they learned about it or if	17:05:34	2 Q Okay. Now, I want to explore what you mean by	17:07:41
3 they had known the whole time and they were just now	17:05:37	3 "common knowledge". It was -- first off, can you	17:07:45
4 sharing it.	17:05:40	4 identify a deputy that told you anything about the group	17:07:50
5 Q But you have no idea; correct?	17:05:41	5 that you call The Executioners?	17:07:58
6 MR. ROMERO: Asked and answered.	17:05:43	6 A I don't remember who the deputy was that was	17:08:00
7 Go ahead.	17:05:44	7 there that day that told me.	17:08:03
8 THE WITNESS: I had no idea where they received the	17:05:45	8 Q I said did you talk to any deputy at any time	17:08:05
9 information from.	17:05:49	9 where you discussed this group?	17:08:12
10 BY MR. IVIE:	17:05:49	10 A There's been a dozen deputies that we've	17:08:15
11 Q Okay. But you've been at that station for five	17:05:50	11 discussed this group with.	17:08:19
12 and a half years. Let me see.	17:05:55	12 Q Okay. Tell me the deputies that you've	17:08:20
13 Approximately what year was it that you had this	17:05:57	13 discussed this group with.	17:08:22
14 conversation with these three deputies?	17:06:00	14 A Oh, my God. Let's see. Deputy [REDACTED]	17:08:23
15 A It was after the Aldama deposition, whenever the	17:06:02	15 Deputy [REDACTED] Deputy [REDACTED] Deputy [REDACTED]	17:08:31
16 year that was. It was 2018. I can't remember	17:06:07	16 Deputy [REDACTED] That's off the top of my head.	17:08:38
17 correctly.	17:06:12	17 Q [REDACTED] and who else?	17:08:49
18 Q And what year -- you're about right. And what	17:06:12	18 A Deputy [REDACTED] Deputy [REDACTED] I think I said,	17:08:52
19 year did you come to the station?	17:06:16	19 Deputy [REDACTED]	17:09:02
20 A 2015.	17:06:17	20 Q Okay. Anybody else?	17:09:03
21 Q So you had been there three years?	17:06:18	21 A Off the top of my head, that's all I can	17:09:10
22 A Yes, sir.	17:06:22	22 remember right now. I'm sure there's more though.	17:09:24
23 Q And you never heard of that name; correct?	17:06:23	23 Q So none of these deputies had the tattoo;	17:09:27
24 A Ever.	17:06:25	24 correct?	17:09:29
25 Q All right. And during the three years that you	17:06:25	25 A No, not that I know of, no.	17:09:30
Page 190		Page 192	
1 were at that station, had you seen anyone with the	17:06:28	1 Q And none of these deputies are in the group;	17:09:33
2 tattoo?	17:06:31	2 correct?	17:09:35
3 A Oh, yes.	17:06:32	3 A Correct.	17:09:35
4 Q Okay. Who was the first person that you saw	17:06:32	4 Q And when did you have this conversations with	17:09:36
5 with that tattoo?	17:06:40	5 these deputies?	17:09:47
6 A Oh, I can't remember who the first person was,	17:06:41	6 A Various times throughout, you know, the last	17:09:48
7 sir.	17:06:44	7 year and a half, two years.	17:09:50
8 Q Did you ever speak to any person who had the	17:06:44	8 Q Only for the last two years you've had this	17:09:52
9 tattoo and ask them to explain it to you?	17:06:48	9 conversation with these deputies about this alleged	17:09:56
10 A No, sir, I did not do that.	17:06:50	10 group?	17:09:59
11 Q And did you ever speak to anyone that had the	17:06:53	11 A Correct, sir.	17:09:59
12 tattoo and ask them, "Hey, are you a member of a group?"	17:06:58	12 Q And that's since there's been coverage about the	17:10:01
13 A No, I never did that.	17:07:02	13 group in the media; correct?	17:10:07
14 Q And you've never done that to this day; correct?	17:07:03	14 A Yes, yes.	17:10:10
15 A No.	17:07:09	15 Q You've read some of those stories, haven't you?	17:10:12
16 Q And you've never spoken to anyone with a tattoo	17:07:10	16 A No. I just saw the one -- the one on the news	17:10:15
17 that told you that they were in a group named	17:07:15	17 clip in the news regarding the Aldama incident.	17:10:19
18 The Executioners?	17:07:18	18 Q Okay. So you read that news article?	17:10:23
19 A No, sir.	17:07:19	19 A I watched it on TV, and I think I also read it	17:10:27
20 Q Now, you said that it was something like common	17:07:20	20 somewhere, yes.	17:10:31
21 knowledge -- that's what I believe your testimony was --	17:07:27	21 Q You read it in the Times; correct?	17:10:31
22 that they were The Executioners?	17:07:33	22 A I don't remember what source it was, but I read	17:10:33
23 A Yes.	17:07:35	23 it somewhere.	17:10:36
24 Q The people with the tattoo were Executioners,	17:07:35	24 Q All right. And the paper talked about	17:10:37
25 you said it was common knowledge?	17:07:38	25 The Executioners and this tattoo; correct?	17:10:40
Page 191		Page 193	

<p>1 A I don't remember seeing Executioners on the 17:10:44      2 paper. 17:10:49      3 Q I see. Okay. So -- 17:10:49      4 MR. SWEENEY: I'm going to object. Vague as to what 17:10:52      5 article. There have been many articles. 17:10:55      6 MR. IVIE: Yes, there has been, very many, a bunch of 17:10:57      7 them. 17:11:00      8 BY MR. IVIE: 17:11:00      9 Q And you've seen several of them, haven't you, 17:11:01      10 Deputy? 17:11:03      11 A When, sir? Because now I've seen articles, yes. 17:11:03      12 Q And you've seen them the last year and a half to 17:11:07      13 two years? 17:11:11      14 A I'm sorry. Prior to -- well, shoot, prior to my 17:11:12      15 claim being submitted, I had seen them, but I haven't 17:11:16      16 seen anything with "Executioners" in the media until 17:11:20      17 after my claim was submitted. 17:11:23      18 Q I see. Well, I will have to show you some of 17:11:25      19 these articles and maybe that will refresh your 17:11:33      20 recollection if I ever get that opportunity. 17:11:37      21 Now, did any of these deputies that you just 17:11:41      22 mentioned, have they ever been a member of 17:11:57      23 The Executioners, as you call them -- 17:12:02      24 MR. ROMERO: Asked and answered. 17:12:06      25 /// 17:12:07</p>	<p>1 partners because a lot of us get drafted from day shift 17:13:17      2 to work p.m.'s because, you know, there's an ink party 17:13:21      3 going on. 17:13:24      4 Q Okay. Now, who's told you that there was an ink 17:13:25      5 party going on? 17:13:28      6 A I can't remember. 17:13:29      7 Q So you can't remember who told you, and you 17:13:32      8 can't remember when you were told; is that what your 17:13:37      9 testimony is? 17:13:40      10 MR. ROMERO: Argumentative; badgering; harassing. 17:13:41      11 THE WITNESS: That's what I'm saying. 17:13:44      12 BY MR. IVIE: 17:13:47      13 Q Okay. Now, you also say that in order to get a 17:13:47      14 tattoo, that a deputy has to have been involved in some 17:14:06      15 use of force? 17:14:13      16 A When did I say that, Counsel? 17:14:14      17 Q I'm asking, is that your testimony? 17:14:16      18 A Say that one more time? 17:14:19      19 Q Let me be clear. Is that your testimony? 17:14:21      20 A Can you repeat the question? 17:14:24      21 Q Is it your testimony that in order to get a 17:14:26      22 tattoo, a deputy has to have been involved in a use of 17:14:29      23 force? 17:14:33      24 A No, that is not my testimony. 17:14:34      25 Q So how does a deputy get the tattoo? 17:14:36</p>
<p style="text-align: right;">Page 194</p> <p>1 BY MR. IVIE: 17:12:07      2 Q -- at any time? 17:12:08      3 MR. SWEENEY: Calls for speculation. 17:12:10      4 THE WITNESS: I don't -- no, not to my knowledge, 17:12:11      5 they're not. 17:12:16      6 BY MR. IVIE: 17:12:16      7 Q All right. Now, you said that there are ink 17:12:17      8 parties? 17:12:27      9 A That's what they call them. 17:12:27      10 Q Now, again, you said that this was common 17:12:28      11 knowledge? 17:12:30      12 A Yes, sir. 17:12:32      13 Q Okay. It is common knowledge, you say, because 17:12:32      14 you talked to some deputies about the ink parties; is 17:12:39      15 that right? 17:12:43      16 A Yes, sir. 17:12:43      17 Q When did you talk to a deputy about an ink 17:12:43      18 party? 17:12:47      19 A After they happened. I can't remember off the 17:12:48      20 top of my head, but it's very easy to find those dates 17:12:52      21 if you look at in-services where you have a large number 17:12:57      22 of these deputies taking off on a Saturday on p.m.'s. 17:13:02      23 Q Okay. So, what, this is something, a 17:13:06      24 conversation that you've had within the last two years? 17:13:13      25 A Well, yes, and complaining about it with my 17:13:15</p>	<p style="text-align: right;">Page 196</p> <p>1 A Well, based on what I've seen, it's after, you 17:14:42      2 know, being involved in a deputy-involved shooting. 17:14:50      3 I've seen █ and Aldama or learned common knowledge 17:14:55      4 that they got inked soon after that shooting, that 17:15:00      5 █ and █ also got inked soon after their 17:15:06      6 shooting. And that's, you know, in the five years that 17:15:10      7 I've been at Compton -- well, four years when the 17:15:13      8 █ incident happened then. 17:15:22      9 A lot of the deputies who get ink have been 17:15:24      10 involved in a lot of, you know, force incidents, more 17:15:27      11 than the average, you know, at the station. So, you 17:15:31      12 know, that's what I see and that's -- you know, I don't 17:15:36      13 know what requirements they have because I've never been 17:15:40      14 asked to be a member of that group so I don't know what 17:15:43      15 the requirements are. I just -- you know, based on what 17:15:46      16 I've observed and see, it's that -- you know, I'd say 17:15:52      17 that, yeah -- 17:15:55      18 Q So you just kind of surmised that based on your 17:15:57      19 perceived observations; is that right? 17:16:03      20 A Based on my perceived observations, correct. 17:16:04      21 Q Okay. So Deputy █ has he had a shooting? 17:16:07      22 A I don't remember. I don't know. 17:16:13      23 Q Has Deputy █ had any force, use-of-force 17:16:15      24 complaints? 17:16:20      25 MR. ROMERO: Calls for speculation. 17:16:23</p>

Page 197

50 (Pages 194 - 197)

1 THE WITNESS: I wouldn't know. 17:16:25	1 A Correct. 17:18:43
2 BY MR. IVIE: 17:16:26	2 Q And as far as you know, anybody that told you 17:18:43
3 Q All right. And you've never talked to him about 17:16:27	3 that didn't speak to him about any of that? 17:18:47
4 that; right? 17:16:30	4 A Maybe they did. I wouldn't know. 17:18:51
5 A No. Him and I don't speak. 17:16:30	5 Q All right. But you don't know the source of any 17:18:53
6 Q And you're not aware of him being involved in 17:16:33	6 of this common knowledge that you are speaking about, do 17:18:56
7 any shootings; is that right? 17:16:36	7 you? 17:19:00
8 A No, not that I remember, no. 17:16:37	8 A Correct. 17:19:00
9 Q And he has a tattoo, doesn't he? 17:16:41	9 Q Okay. By the way, you said -- have you ever 17:19:01
10 A Yes. 17:16:44	10 been a gang member? 17:19:11
11 Q Okay. And you don't know if he got that tattoo 17:16:45	11 A No, sir. 17:19:13
12 because he was invited to get a tattoo, do you? 17:16:52	12 Q And have you ever gotten any training in gangs? 17:19:13
13 A As far as I know, he was invited to get the 17:16:55	13 A You know, the training that they give us in, you 17:19:19
14 tattoo. 17:16:57	14 know, the academy, we learned a little bit from, you 17:19:23
15 Q How do you know that? 17:16:57	15 know, when I came to the station, and then whatever we 17:19:29
16 A Common knowledge. 17:16:58	16 experienced at the station regarding gangs. 17:19:32
17 Q Okay. Common knowledge. Let's talk about 17:16:59	17 Q Okay. But you're not a gang expert, are you? 17:19:34
18 that. When you say "common knowledge", do you mean 17:17:02	18 A No, sir. 17:19:37
19 that's something that somebody told you? 17:17:05	19 Q You've heard of the term "gang expert"; right? 17:19:38
20 A It's something that the line of deputies know, 17:17:07	20 A Yes, sir. 17:19:41
21 that the deputies working the line know. That's common 17:17:12	21 Q And those are people that have intimate 17:19:42
22 knowledge. 17:17:15	22 knowledge about the gangs. They study the gangs. 17:19:49
23 Q How do you know they know? Did anyone ever tell 17:17:15	23 A Yes. 17:19:52
24 you that [REDACTED] got a tattoo because he was invited to 17:17:19	24 Q Or they've infiltrated the gangs and things of 17:19:52
25 get a tattoo? 17:17:25	25 that nature. 17:19:56
	Page 200
1 A It's been more like, "Oh, [REDACTED] got inked this 17:17:26	1 A No. 17:19:57
2 weekend" or [REDACTED] just got inked" type of thing. 17:17:30	2 Q You've not done any of that; correct? 17:19:57
3 Q Okay. Who said that? 17:17:34	3 A No, sir. 17:19:58
4 A Again, it's -- I don't remember. It's word at 17:17:36	4 Q Now, in your claim, you said there were 20 17:19:59
5 the station. 17:17:46	5 prospects; do you recall that? 17:20:06
6 Q So you don't remember who said it. And when was 17:17:47	6 A Yes. 17:20:14
7 that said? 17:17:53	7 Q And what are their names? 17:20:15
8 A Soon after he got inked. 17:17:53	8 A Deputy [REDACTED] Deputy [REDACTED] Deputy [REDACTED] 17:20:17
9 Q And when did he get inked? 17:18:00	9 (spelled phonetically) Deputy [REDACTED] Deputy [REDACTED] 17:20:41
10 A Oh, I don't remember. 17:18:02	10 Deputy [REDACTED] 17:20:52
11 Q Well, if you don't remember when he got inked, 17:18:03	11 Q Who? 17:20:52
12 how can you know it was soon after he got inked that 17:18:08	12 A Deputy [REDACTED] Deputy [REDACTED] 17:20:53
13 somebody said that? 17:18:11	13 Q I'm sorry. Deputy -- 17:20:57
14 A Because the station learned about it right after 17:18:12	14 A [REDACTED] 17:20:58
15 everybody -- the people who get inked get inked. 17:18:15	15 Q [REDACTED] Okay. 17:21:00
16 Q So you don't remember when you heard that, and 17:18:22	16 A Deputy [REDACTED] Deputy [REDACTED] Well, these are 17:21:01
17 you don't remember when he got it? 17:18:24	17 the prospects I -- again, it's common knowledge. I 17:21:11
18 MR. ROMERO: Asked and answered. 17:18:30	18 heard he just got inked. 17:21:15
19 THE WITNESS: Correct. 17:18:33	19 Q And Deputy [REDACTED] was he involved in a shooting? 17:21:27
20 BY MR. IVIE: 17:18:34	20 A No. 17:21:31
21 Q Is that right? 17:18:35	21 Q When did he get inked? 17:21:31
22 Okay. All right. But you do know he didn't 17:18:36	22 A Supposedly not too long ago. Recent. Like 17:21:37
23 tell you -- 17:18:38	23 weeks. 17:21:41
24 A Correct. 17:18:39	24 Q Did you ever see it? 17:21:41
25 Q -- or something along those lines? 17:18:39	25 A No. 17:21:47
	Page 201

1 Q Now, you claim that Captain Thatcher knew about 17:28:15  
2 the existence of this group. Is it true that your only 17:28:38  
3 basis for making this statement is that he sent out an 17:28:44  
4 e-mail concerning this tattoo? 17:28:49

5 A No, it wasn't just the e-mail. It was, you 17:28:54  
6 know, a number of things. It was, you know, the whole 17:28:57  
7 thing with the stats and how -- 17:29:03

8 Q It was the what? 17:29:05

9 A The stats. The arrest stats. 17:29:07

10 Q Okay. 17:29:10

11 A Combined with, you know, the [REDACTED] 17:29:12  
12 incident with Acting Captain [REDACTED] and then bringing 17:29:21  
13 him back, and then Thatcher knowing about the last 17:29:25  
14 incident with [REDACTED] girlfriend where she did not 17:29:34  
15 assist her partner when her partner was fighting for his 17:29:38  
16 life. 17:29:42

17 And history shows that deputies who have been 17:29:43  
18 involved in fatalities get fired from the department. 17:29:47

19 It wasn't the case with her because, you know, it's our 17:29:52  
20 belief that that was Thatcher's last favor to [REDACTED] 17:29:59  
21 before he retired. 17:30:03

22 Q Okay. And [REDACTED] girlfriend's name is -- I'm 17:30:05  
23 sorry. The deputy's name is -- you said she was his 17:30:11  
24 girlfriend? 17:30:14

25 A Is still. I think they're still together. 17:30:15

Page 206

1 A The last four of 2019. 17:31:57  
2 Q Okay. And what was this incident? 17:32:00  
3 A Her and her partner are trying to cuff this 17:32:02  
4 individual, and they get into a fight. The individual 17:32:14  
5 is resisting, and Deputy [REDACTED] is the one trying to 17:32:20  
6 control the suspect while Deputy [REDACTED] is just standing 17:32:26  
7 around looking at her radio, going back into the car and 17:32:30  
8 then comes out and doesn't do anything to help out her 17:32:37  
9 partner, and her partner is now on the floor fighting 17:32:40  
10 this suspect. 17:32:44

11 Q Okay. And you were present? 17:32:46

12 A Oh, there's a video. I saw a video of it. 17:32:49

13 Q Okay. You saw a video of it? 17:32:52

14 A Yes, sir. 17:32:55

15 Q Okay. And where did you see the video? 17:32:55

16 A I can't remember where I saw it. It was on some 17:33:00  
17 type of social media. Somebody texted it to me. It was 17:33:05  
18 going around the station. The whole department knew 17:33:08  
19 about this. The whole department was commenting on as 17:33:11  
20 to why -- and not just our department, other agencies, 17:33:14  
21 why this deputy was still working for our department and 17:33:17  
22 saying that she had no business being a Deputy Sheriff. 17:33:23  
23 Q I see. And you still have the video? 17:33:27

24 A No, I don't think so. 17:33:29

25 Q You don't have the video? 17:33:31

Page 208

1 Q And what's her name? 17:30:18  
2 A [REDACTED] 17:30:20

3 Q Okay. So it was the stats, you say, it was the 17:30:22  
4 e-mail, it was bringing [REDACTED] back, and then it was the 17:30:29  
5 treatment of Deputy [REDACTED] Anything else? 17:30:43

6 A Not that I can remember right now. 17:30:48

7 Q All right. So based on these things, you've 17:30:51  
8 made this accusation that Thatcher knew, 17:30:54  
9 Captain Thatcher knew about the existence of this group? 17:30:59

10 MR. SWEENEY: Objection. It's argumentative. 17:31:04

11 THE WITNESS: That's my belief. 17:31:08

12 BY MR. IVIE: 17:31:09

13 Q Okay. So if we can take these in reverse order, 17:31:12  
14 let me first ask you about [REDACTED] You said she 17:31:18  
15 demonstrated cowardice and didn't assist her partner. 17:31:22  
16 When was that? 17:31:27

17 A It was late last year. 17:31:27

18 Q Okay. Late last year in what, December 2019? 17:31:33

19 A I don't remember. I don't remember the exact 17:31:39  
20 date. I mean, I could, you know, look it up. I mean, I 17:31:40  
21 could find it. 17:31:45

22 Q Just give me your best estimate. 17:31:46

23 A I don't remember. Late last year. That's my 17:31:48  
24 estimate. 17:31:54

25 Q What do you mean by "late"? Just tell me that. 17:31:54

Page 207

1 A No. 17:33:36  
2 Q Are you sure you don't have it? 17:33:36  
3 A As far as I know, I don't have it. It was one 17:33:38  
4 of those, you know, click -- you know, like those videos 17:33:42  
5 on -- it was like a link to a social media so I don't 17:33:47  
6 know if it's still there or not. 17:33:54  
7 Q But you didn't keep a copy of it? 17:33:56  
8 A No. 17:34:00

9 Q Okay. And so who was her partner? 17:34:00

10 A Deputy [REDACTED] 17:34:07

11 Q Did you ever speak to [REDACTED] about it? 17:34:08

12 A No. No. 17:34:12

13 Q And were administrative charges brought against 17:34:17  
14 Deputy [REDACTED] 17:34:30

15 A The word was that she had -- she was just going 17:34:31  
16 to be sent to training. 17:34:36

17 Q Now, you've known Deputy [REDACTED] for quite some 17:34:37  
18 time; correct? 17:34:49

19 A Yes, sir. 17:34:49

20 Q You went through training school with her, 17:34:50  
21 didn't you? 17:34:52

22 A We were at the same academy. 17:34:53

23 Q Yeah, that's right. 17:34:55

24 A Yes, sir. 17:34:56

25 Q All right. And you also filed a -- and for a 17:34:57

Page 209

1 while, she was your partner; right? 17:35:01	1 Q You never talked to him about the incident? 17:38:02
2 A We would jump in from time to time. 17:35:02	2 A No. 17:38:04
3 Q And this is -- and you both started at Compton 17:35:07	3 Q You had never written him any memos about the 17:38:05
4 around the same time; is that right? 17:35:11	4 incident? 17:38:08
5 A No. I started first. I got off training, and 17:35:12	5 A About [REDACTED] and the force incident? 17:38:08
6 then she came -- I want to say she came, like, maybe 17:35:16	6 Q Yes. 17:38:11
7 eight months after I did. Maybe late 2015, early 2016 17:35:19	7 A No, but common practice is any force incident 17:38:12
8 maybe. 17:35:24	8 goes up to division. 17:38:18
9 Q Okay. And then in, I guess, January of 2018, 17:35:24	9 Q And he's never told you that he knew about the 17:38:20
10 you and [REDACTED] had a little verbal altercation; is that 17:35:34	10 incident? 17:38:23
11 right? 17:35:38	11 A No, sir. 17:38:23
12 A Yes, we did. 17:35:38	12 Q Okay. And has anyone ever told you that they 17:38:24
13 Q And she accused you of hitting her with your 17:35:41	13 discussed the incident with Commander Thatcher? 17:38:32
14 patrol car; is that right? 17:35:48	14 A No, sir. 17:38:36
15 A Well, I didn't know she had accused me of that. 17:35:50	15 Q Now, you've talked a lot about the stats, about 17:38:36
16 I notified my watch commander that day that while having 17:35:53	16 arrest stats. What are arrest stats? 17:38:50
17 a suspect in my back seat, she didn't want to move away 17:35:59	17 A Arrest stats is the arrests that a station gets. 17:38:53
18 from my vehicle so I could park, and she went off on me 17:36:03	18 Q And does it keep a record of the number of 17:39:01
19 saying -- you know, using profanity and all sorts of 17:36:06	19 arrests that particular deputies make? 17:39:06
20 other things. 17:36:10	20 A Yes, sir. 17:39:08
21 Q All right. And you reported her for that? 17:36:11	21 Q And you said that the stats for Compton were 17:39:09
22 A Yes. You know, work violence or violence in the 17:36:15	22 lower than some other stations? 17:39:15
23 workplace. 17:36:19	23 A That was the complaint. 17:39:17
24 Q Okay. And you believe Captain Thatcher knew 17:36:20	24 Q Okay. And you said there was a quota of arrests 17:39:19
25 about this incident? 17:36:38	25 that was set? 17:39:24
	Page 210
	Page 212
1 A He found out. They reported it to him. 17:36:39	1 A I call it a quota, yes. 17:39:26
2 Q Who reported it to him? 17:36:42	2 Q What was the quota? 17:39:28
3 A In the station, we assumed Lieutenant [REDACTED] 17:36:45	3 A Well, to raise the number we had. We were at a 17:39:30
4 who was the lieutenant who took the complaint. 17:36:49	4 number, and they didn't like that number. They wanted 17:39:33
5 Q He took a complaint from whom? 17:36:51	5 more. That, to me, is a quota. 17:39:36
6 A From me. 17:36:53	6 Q So telling deputies to increase their 17:39:38
7 Q About -- no, no, no. I'm not talking about this 17:36:54	7 productivity is a quota in your mind? 17:39:48
8 incident. Not the incident between you and [REDACTED] I'm 17:36:58	8 A It isn't productivity. 17:39:51
9 sorry. I jumped around, and I shouldn't have. Excuse 17:37:02	9 Q Well, these arrests is what deputies do; right? 17:39:53
10 me. 17:37:05	10 A They said stats. 17:39:56
11 I was asking you about the incident involving 17:37:06	11 Q Pardon me? 17:39:59
12 [REDACTED] and [REDACTED] Do you believe that 17:37:10	12 A They said stats. 17:40:00
13 Captain Thatcher knew about this incident? 17:37:14	13 Q All right. To increase stats is to increase 17:40:02
14 A Commander Thatcher knew about it, yes. He's 17:37:18	14 arrests; correct? 17:40:05
15 our, you know, commander. 17:37:22	15 MR. ROMERO: I would object to the extent that we're 17:40:06
16 Q So how do you know that he knew about this 17:37:23	16 talking about seven arrests a month, so it lacks 17:40:10
17 incident? 17:37:26	17 foundation that all deputies do is make arrests. 17:40:12
18 A How could he not know? 17:37:26	18 THE WITNESS: Can you repeat your question? 17:40:15
19 Q I'm asking you how do you know he knew? Is that 17:37:34	19 MR. IVIE: I don't think that was my question, 17:40:17
20 an assumption you're making? 17:37:38	20 Counselor, but that's okay. I said that -- well, let me 17:40:19
21 A He came to the station right after that 17:37:43	21 have the question read back, Mr. Reporter? 17:40:23
22 incident, and he came to talk to the captain. I just 17:37:46	22 THE COURT REPORTER: "Question: To increase stats is 17:40:31
23 don't see how he wouldn't know about one of his troops 17:37:52	23 to increase arrests; correct?" 17:40:43
24 getting into an incident like that so, yes, I'm assuming 17:37:56	24 THE WITNESS: Yes. 17:40:43
25 he did know. 17:38:01	25 /// 17:40:44
	Page 213